

EXHIBIT A

Proposed Order

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

VOYAGER DIGITAL HOLDINGS, INC., *et al.*,

Debtors.¹

)
) Chapter 11
)

) Case No. 22-10943 (MEW)
)

) (Jointly Administered)
)

**ORDER GRANTING THE PLAN ADMINISTRATOR’S SECOND
OMNIBUS OBJECTION TO CERTAIN FILED PROOFS OF CLAIM**

Upon the objection (the “Objection”)² of the Plan Administrator seeking entry of an order (this “Order”) modifying each of the Disputed Claims listed on **Schedule 1** (the “Incorrect Debtor Claims”) and **Schedule 3** (the “USD Claim”) to this Order and disallowing each of the Disputed Claims listed on **Schedule 2** (the “Superseded Claims”) to this Order and as more fully set forth in the Objection; and upon the Renzi Declaration filed in support of the Objection; and the Court having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference from the United States District Court for the Southern District of New York*, entered February 1, 2022; and the Court having the power to enter a final order consistent with Article III of the United States Constitution; and the Court having found that venue of this proceeding and the Objection in this District is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and the Court having found that the Plan Administrator provided adequate and appropriate notice of the Objection under the circumstances; and the Court having reviewed

¹ The Wind-Down Debtor in these chapter 11 cases, along with the last four digits of each Wind-Down Debtor’s federal tax identification number, are: Voyager Digital Holdings, Inc. (7687); Voyager Digital Ltd. (7224); and Voyager Digital, LLC (8013). The service address for purposes of these chapter 11 cases is 27777 Franklin, Suite 2500, Southfield, MI 48034.

² Capitalized terms used but not otherwise defined herein have the meanings ascribed to them in the Objection.

the Objection and having heard the statements in support of the relief requested therein at a hearing before the Court (the “Hearing”); and the Court having determined that the legal and factual bases set forth in the Objection and at the Hearing establish just cause for the relief granted herein; and upon all of the proceedings had before the Court; and after due deliberation and sufficient cause appearing therefor, it is HEREBY ORDERED THAT:

1. The Objection is granted as set forth herein.
2. Any response to the Objection not otherwise withdrawn, resolved, or adjourned is hereby overruled on its merits with prejudice.
3. Pursuant to Bankruptcy Code section 105(a), Bankruptcy Rule 3007, and the Claims Objection Procedures Order:
 - a. Each Incorrect Debtor Claim identified on **Schedule 1** hereto is modified so as to correct the identity of the Debtor entity against whom the Claim is asserted, as set forth in the column titled “Correct Debtor Entity” on **Schedule 1**;
 - b. The claims identified as “Claims to be Disallowed” on **Schedule 2** are hereby disallowed in their entirety, without prejudice to the claims listed as “Surviving Claims” on that schedule;
 - c. Each USD Claim identified on **Schedule 3** is hereby modified as set forth on **Schedule 3** to reflect the cryptocurrency balances reflected in the Books and Records;
4. Each Disputed Claim and each objection to each Disputed Claim, as addressed in the Objection, constitute a separate contested matter as contemplated by Bankruptcy Rule 9014. This Order will be deemed a separate Order with respect to each Disputed Claim. Any stay of

this Order pending appeal by any Claimants whose claims are subject to this Order will only apply to the contested matter that involves such Claimant and will not act to stay the applicability or finality of this Order with respect to the other contested matters identified in the Objection or this Order.

5. The Plan Administrator authorized to take all actions necessary to effectuate the relief granted in this Order in accordance with the Objection, including expunging the disallowed Disputed Claims from the claims register.

6. Notice of the Objection as provided therein, shall be deemed good and sufficient notice of the Objection, and the requirements set forth in rule 9013-1(b) of the Local Rules are satisfied.

7. This Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

New York, New York

Dated: _____, 2023

THE HONORABLE MICHAEL E. WILES
UNITED STATES BANKRUPTCY JUDGE